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Cal/EPA

Department of Toxic Substances Control

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Arnold Schwarzenegger
Governor

January 7, 2004

Mark Alling
West Coast Regional Manager
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CLOSURE CERTIFICATION ACKNOWLEDGEMENT FOR THE TREATMENT AND STORAGE UNITS AT PHIBRO-TECH INC., 34400 ZWISSIG WAY, UNION CITY, CALIFORNIA, EPA ID# CAD 981 160 948

Dear Mr. Alling:

On September 19, 2001, the Phibro-Tech Inc. (PTI) notified the Department of Toxic Substances Control (DTSC) in writing that it intended to close its interim status hazardous waste management facility located in the Union City, Alameda County.

On February 28, 2003, DTSC approved the closure plan (CP) for the following hazardous waste management units (HWMUs) at the PTI Union City facility:

- Containment 1: Tanks (T-32, T-31, T-10, T-4, T-3, R-14, R-7, R-4, R-3, and R-2)
- Containment 2 (containment structure only)
- Containment 3: Tank (R-6), and truck loading area
- Containment 4: Tanks (R-15, R-12, and R-11)
- Containment 5: Drum storage area
- Containment 6: Tank (T-7)
- Rail Spur
- Outside storage areas

DTSC received PTI's Closure Certification Report (Report) dated October 30, 2003. The Report was signed by both the owner and an independent professional engineer registered in California certifying that the HWMUs were closed in accordance with the approved CP with minor deviations.

The approved closure plan initially called for decontaminating all tanks and containment structures to acceptable clean up levels and retaining them in place. During the closure

construction, however, all tanks were triple rinsed, removed from the facilities and disposed at authorized facilities. Containment structures #1 through 4 were removed and disposed at authorized facilities. These deviations are considered minor because they did not change the closure performance standards.

The closure report documented the closure activities including the following:

1. All tanks except R-12 were decontaminated and removed from the site by disposing them at authorized land fills or scrap metal yards. Tank R-12 was shipped to PTI's Santa Fe Spring facility, an authorized hazardous waste management facility for future use.
2. Waste inventory was removed. Residual waste was either disposed at authorized facilities or sent to PTI Santa Fe Spring facility for treatment.
3. Containment structures 1, 2, 3, and 4 were removed and disposed at the authorized facilities.
4. Containment structures 5 and 6 were decontaminated.
5. Concrete samples were taken from containment structures.
6. Eighty (80) confirmation soil samples were taken from rail spur, background areas and below all containment structures.
7. Limited soil removal was done at Containments 1, 2, 3, and 4, and confirmation soil samples were taken from where soil excavation was.
8. Hazardous waste handling equipment was decontaminated and removed from the site by either disposing of them at authorized landfills or scrap metal yards.
9. Four groundwater samples were taken.

The confirmation soil samples, concrete samples and groundwater samples were analyzed for constituents of concern, such as Arsenic (As), Cadmium (Cd), total Chromium (Cr), Copper (Cu), lead (Pb) and Nickel (Ni). Hexavalent chromium was not handled at the site and therefore was not analyzed, except for background soil samples. All confirmation soil sample results were compared to risk based levels (residential), and concrete samples were compared to background concrete samples.

This letter acknowledges the closure certification dated October 30, 2003. DTSC now considers the hazardous waste management units at your Union City facility to be closed to meet the cleanup levels for residential land use.

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This acknowledgement is based on the representation that the information submitted as well as any other information provided to DTSC to use as basis for this decision is true and accurate. Any inaccuracies found in such information may be grounds for subsequent nullification of the Closure Certification and potential enforcement action. The owner/operator must inform DTSC of any deviations from or changes in the information provided which would affect the Closure Certification of these units.

Please be advised that the acknowledgement of the above-referenced HWMUs closure is not a certification that your facility does not pose any environmental or public health threat. This letter does not remove any liabilities associated with past hazardous waste management practices which occurred at the facility. This Closure Certification does not limit or preclude any future investigations of any other on-site operation by any agency, nor in resulting corrective action deemed necessary for closure and remediation of any solid waste management units at the facility. This Closure Certification does not constitute termination of your interim status nor is it a determination that corrective action has been terminated.

By copy of this letter, the Standardized Permitting and Corrective Action Branch is also informing the Financial Responsibility Unit of this acknowledgement.

If you have any questions, please call Ms. Wei-Wei Chui of my staff at (510) 540-3975.

Sincerely,



Mohinder S. Sandhu, P.E., Chief
Standardized Permitting and Corrective Action Branch

cc: see next page

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